

From: Ronald Krome <tkrome68@yahoo.com>
Sent: Thursday, September 8, 2022 4:35 PM
To: mmonteiro@mflawny.com
Subject: Re: Failure Notice

This is the tax document that was sent previously. Please let us know about our requests about the interrogatories from William and Jose.



From: Ronald Krome <rkrome68@yahoo.com>
Sent: Tuesday, September 20, 2022 4:04 PM
To: mmonteiro@mflawny.com
Subject: Re: Failure Notice

Dear Mr. Monteiro Esq,

We will reach out to our clients Today. Our office is only now available. on September 28(at 12PM), 29, 30, October 2, 3,, 5, 7. Jose and Ali have issues with a Friday deposition due to their work schedule, so they need a Thursday. Christina is not available specifically on September 30. Perhaps we can have our clients go October 2,3 and your clients go on September 28, 29 and or 30th. Lets us know if that works for you, we will then ask our clients Today We presume you are not agreeing to depositions for your clients for September 22, 23 which we originally agreed to. There is no requirement under the FRCP that the depositions need to be back to back, but we can try to work that out if that is your request. ~~Remember we still have no interrogatory responses from Jose Gutierrez and William Rodriguez and we reserved them to you last week. Please confirm when we ask if you received documents by email, there have been claims by your office that some documents in the past were not received, so please just confirm so we know you got them.~~ Remember that Your clients also need to comply with discovery and we are aware of the discovery that was requested from your clients and will gather the rest of what our clients have. The deposition notices are not deficient as they in compliance with the FRCP rules, if they are not send a letter explaining why they are deficient as they contain the same material elements as the ones your office sent for our clients. If you like to discuss dates for depositions Today, will be available by phone this evening till late. Want to work with you but will not be awaiting to the last minute to schedule a reporter, interpreter and we need to have our office be prepared and our clients ready to go. Please give us proposed dates for your clients, how about September 28, 29, and or 30th.

Davinci

From: mmonteiro@mflawny.com

To: rkrome68@yahoo.com

Date: Monday, September 26, 2022 at 03:23 PM EDT

Stephen:

I urgently need the signed NYS-45's and Form 941's today.

We've been promised these documents for months.

Will produce rog responses and discovery and inspection by tomorrow.

Marcus Monteiro, Esq.
Partner | Monteiro & Fishman LLP



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[www.getovertimepay.com](http://www.getovvertimepay.com)

RE: Davinci

From: mmonteiro@mflawny.com

To: rkrome68@yahoo.com

Date: Tuesday, September 27, 2022 at 05:37 PM EDT

Stephen:

Attached are the interrogatory response for Jose Gutierrez.

Plaintiffs globally responded to all Defendants Discovery and Inspection on May 25, 2022.

Please confirm Defendants deposition dates pursuant to prior emails.

Best,

Marcus Monteiro, Esq.
Partner | Monteiro & Fishman LLP

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